

December 18, 2024

Via ECF

MEMO ENDORSED

The Honorable Colleen McMahon
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2550
New York, NY 10007-1312

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Re: **Caillat et al. v. Adjmi et al., Case No. 24-cv-07417-CM**
Joint Letter Motion for Adjournment of Conference and Motion Deadline

Dear Judge McMahon:

Plaintiffs Kenneth Caillat and Steven Stiefel ("Plaintiffs") and Defendants Seaview Productions Holdings LLC, Sonia Friedman Productions Limited, Linden Productions, LLC, Playwrights Horizons, Inc., The Shubert Organization, Inc., Sue Wagner, John Johnson, Ashley Melone, and Nick Mills (collectively, "Defendants") in the above-referenced action write jointly pursuant to Section I.D of Your Honor's Individual Practices and Procedures to respectfully request an adjournment of the initial conference and motion to dismiss filing deadline to January 10, 2025.

Counsel last wrote to the Court jointly on December 3, 2024 to advise that the parties had reached a resolution of the dispute in principle and to request that the initial conference be adjourned from December 5 to December 23, 2024. The Court granted this request (ECF Dkt. No. 22). The parties and their counsel are still in the process of working through a written version of their (confidential) settlement agreement. That has taken longer than anticipated given the complex nature of the agreement, the number of parties involved in the dispute and the various approvals required as a result, and plaintiffs' counsel's travel for another litigation. We respectfully submit that the parties would benefit from additional time to finalize their written agreement, and that moving forward with a conference appearance or motion practice in the interim would result in a waste of the Court's and parties' resources. Accordingly, we respectfully request that both the initial conference and the motion filing deadline be adjourned to January 10, 2025 (and that the current opposition and reply deadlines following therefrom be adjourned commensurately).

This is the second request for an extension of the initial conference and third request for an extension of the motion filing deadline. The parties mutually consent to this request.

We thank the Court for its time and consideration of this matter.

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Respectfully submitted,

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